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To: Members of the Wisconsin Legislature

Re: 2005 Cost-efficiency Analysis for Wisconsin's Public Transit Systems

The Wisconsin Department of Transportation is required to have cost-efficiency standards for Wisconsin transit systems, as specified by statute and administrative rule. The language contained in Administrative Rule TRANS 4 states:

"The department shall assess the performance of each transit system receiving aid under the {state operating assistance} program on an annual basis, using the six performance indicators defined in <u>sub. (2)</u>. . . . "

The six performance indicators are: passengers/capita, expense/passenger, expense/revenue hour, passengers/revenue hour, revenue hours/capita, and operating ratio (revenue/expense ratio). The cost-efficiency standards implementation plan (attached) discusses in greater depth the process and methodology for determining transit system compliance.

The preliminary results of this analysis show that 66 of Wisconsin's 68 transit systems are in compliance with the cost-efficiency standards. Further analysis is underway for two transit systems, Lake Mills (Shared Ride Taxi) and Waupun (Shared Ride Taxi), whose stage 1 & 2 analyses indicate a need for further evaluation.

The process of analysis follows a tiered methodology (attached). Transit systems are divided into six peer groups based on commonality of operating system characteristics. The first stage of analysis involves peer group comparisons by system type. To be judged in compliance at this stage, a transit system must meet or exceed the performance standard for four of the six performance measures.

Seven transit systems, (Grant Co., Lake Mills, New Richmond, Ozaukee Co., Plover, Washington Co, and Waupun) were found to be out of compliance with three or more of the six performance measures after this step. A detailed chart of the step one analyses is attached.

For transit systems not meeting the cost-efficiency standards at step one, a second stage of analysis is prescribed. That analysis involves a time-trend review over a five-year period. When a system shows improvement over those five years in enough measures so that the number totals at least four of the six indicators, then that system is deemed to be in compliance.

After performing the second step of the analysis, one transit system, Lake Mills Shared-ride Taxi, will need a third step evaluation. A detailed matrix of the step two analysis is also

attached. Waupun shared-ride taxi service was also deficient after the time-trend analysis. However, the City of Waupun ended taxi service after 1998 and later decided to reestablish service again in 2002. Waupun also had two different transit contractors in 1998 and 2002. Given the three-year suspension of service and the operational differences, the step two trend analysis will be postponed until more data is established.

A third tier analysis assesses the implementation status of recommendations made in the transit system's most recently completed management performance audit. A third tier analysis for Lake Mills could not be performed as management performance audits have not traditionally been performed for Shared Ride Taxis. Therefore, Wisconsin DOT will now do a management performance audit of these systems to begin the third tier analysis process. Lake Mills is deemed to be in compliance until the performance review is completed and recommendations for improvement are available.

In viewing the detailed data sheets, it is useful to note that the analyses for Milwaukee County, Madison, and the medium-sized bus systems use an external peer group. The data is drawn from the National Transit Database for the year 2002. The analyses for the small-sized bus systems, commuter bus systems, and shared-ride taxi systems use the statewide peer group itself for comparison, since comparable national transit data for these systems is not available. This group uses the most recently audited state data, which is 2002.

If you have any questions about these standards or the analysis, please contact me at 608-266-2963.

Sincerely,

Rod Clark, Director

Rod Clark

Bureau of Transit and Local Roads

**Enclosures** 

cc: Transit Systems

### COST EFFICIENCY STANDARDS IMPLEMENTATION PLAN

### BACKGROUND

- 1. Cost efficiency standards will be established for each of the following performance indicators:
  - A. The ratio of passengers, as expressed in unlinked trips, to service area population.
  - B. The ratio of operating expenses to passengers, as expressed in unlinked trips.
  - C. The ratio of operating expenses to revenue hours.
  - D. The ratio of revenues to operating expenses.
  - E. The ratio of passengers, as expressed in unlinked trips, to revenue hours.
  - F. The ratio of revenue hours to service area population.
- **2.** For purposes of establishing cost efficiency standards, transit systems are divided into the following peer groups:
  - 1. Milwaukee
  - 2. Madison
  - 3. Medium Bus Systems
  - 4. Small Bus Systems
  - 5. Commuter Bus Systems
  - 6. Shared-Ride Taxi Systems

### STEP 1

Prepare tables for each of the performance indicators for each of the peer groups.

For the Milwaukee, Madison, and the Medium Bus Systems, peer groups of similar sized transit systems with similar operating characteristics external to the state will be developed to establish the cost efficiency standards. For each of these groups, the transit systems used to establish the peer group will be those used in the most recent management performance audit. Data used for these transit systems will be the most recent available from the National Transit Database.

For Small Bus, Commuter Bus, and Shared-Ride Taxi systems, standards shall be established using data from only in-state systems. Data used shall be from the most recently audit calendar year.

For all peer groups, standards will be established for each of the six performance indicators by using a standard deviation. Systems that are within one standard deviation of the arithmetic mean shall be judged as in compliance with the standard for the

measure. Systems that meet the standards for 4 of the 6 performance measures shall be deemed in compliance with the cost-efficiency standards.

### STEP 2

For those systems not in compliance with the cost efficiency standard after completion of Step 1, prepare tables showing a time-trend analysis of each of the six performance measures over the most recent five-year period. Systems showing improvement in measures in which they did not meet the standards in Step 1 will be deemed in compliance with the cost efficiency standards if when added to the number of measures they were in compliance with in Step 1 the total is 4 or more.

### STEP 3

For those systems still not in compliance after completion of Steps 1 and 2, assess the implementation status of recommendations made in the system's most recently completed management performance audit. A system that has made significant progress in implementing the majority of recommendations targeted at improving efficiency shall be deemed in compliance with the cost efficiency standards. At this time, WISDOT shall notify all transit systems of their status relative to compliance with the cost efficiency standards.

### STEP 4

If any transit systems remain out of compliance after completion of Steps 1 through 3, one of the following actions will be taken:

- A. If management performance audit recommendations have not been implemented, WISDOT shall provide technical assistance to aid in the implementation of the recommendations. If consultant services are necessary, the transit system shall pay the nonfederal share of the costs.
- B. If a management performance audit has not been conducted within the last three years, WISDOT shall schedule an audit as soon as possible.

### **PENALTY**

Systems deemed out of compliance with the cost efficiency standards as outlined above will be given a three-year period of time in which to comply before being assessed a revenue penalty. After three years of non-compliance, a 10% revenue penalty shall be imposed, which will limit state aids to 90% of the state aid the system would have been entitled to if it were in compliance. The penalty remains in effect until the system comes into compliance.

### PERFORMANCE STANDARDS MEDIUM BUS EXTERNAL PEER GROUP SUMMARY

### Performance Measure Data Mean Standard Deviation \$10.51 \$58.09 18.30% Cost/Hour 2002 Operating Ratio 2002 9.87% \$3.22 Cost/Passenger 2002 \$0.99 Passenger/Hour Passenger/Capita 2002 19.45 5.84 2002 11.35 6.66 Hours/Capita 2002 0.56 0.21

### Performance Parameters

+/- One Standard Deviation

\$47.58	\$68.60
8.43%	28.17%
\$2.23	\$4.22
13.62	25.29
4.69	18.01
0.35	0.78

<sup>\*</sup>Shading denotes system outside of the St. Dev.

	ense/	Operating		Cost/	Passengers/	Passengers/	Revenue Hours/
Medium Bus	\$ 63.06	Ratio 10.99%	\$	Passenger 3.86	Revenue Hour 16.35	Capita 5.57	Capita 0.34
Apple-Valley Transit Beloit-BTS	67.06	13.40%	-	4.62			0.34
Eau Claire-ECTS	\$ 49.21	17.65%	1	2.23	14.53 22.06	4.69 13.05	0.32
	\$ 57.69	14.75%	_	2.23	22.06	8.99	0.59
Green Bay-GBT Janesville-JTS	\$ 66.88	17.48%	_	4.17	20.9 <del>4</del> 16.04	7.11	0.43
Kenosha-KT	\$ 63.68	17.48%		2.51	16.0 <del>4</del> 25.42	7.11 15.72	0.44
LaCrosse Municipal Transit	\$ 54.60	11.48%	_	3.32	16.44	10.16	0.62
Oshkosh-OTS	\$ 51.43	12.70%		2.29	22.44	12.55	0.56
Racine-Belle Urban System	\$ 54.27	16.43%		3.17	17.14	13.73	0.80
Sheboygan-STS	\$ 45.71	18.05%		4.65	9.82	8.95	0.91
Waukesha - WTC	\$ 47.79	17.60%		3.85	12.40	12.21	0.98
Wausau - WATS	\$ 59.37	14.71%		2.97	20.00	11.12	0.56
Greely-The Bus	\$ 54.55	14.93%		3.58	15.22	4.27	0.28
Dubuque - City of	\$ 53.19	10.79%	_	2.90	18.36	6.27	0.34
Iowa City Transit	\$ 65.11	24.85%		2.13	30.50	16.21	0.53
Boise Urban Stages	\$ 62.49	16.08%		4.07	15.35	4.14	0.27
Decatur-DPTS	\$ 50.62	11.54%		3.16	16.00	8.44	0.53
Bloomington-BPT	\$ 42.32	31.18%		1.60	26.52	21.24	0.80
Evansville-METS	\$ 48.41	22.95%		3.05	15.86	6.33	0.40
Muncie-MITS	\$ 63.55	9.26%	\$	3.03	20.96	14.20	0.68
Battle Creek-BCT	\$ 69.96	14.70%	\$	3.50	19.96	7.50	0.38
Bay City-BMTA	\$ 61.08	21.48%	\$	6.62	9.22	6.46	0.70
Jackson-JTA	\$ 51.52	38.64%	\$	2.60	19.84	6.04	0.30
Kalamazoo-KMTS	\$ 66.12	13.29%	\$	3.03	21.82	13.80	0.63
Muskegon Area Transit	\$ 53.03	12.28%	\$	4.63	11.47	2.52	0.22
St. Cloud - SCMT	\$ 49.79	24.34%	\$	2.12	23.45	16.56	0.71
Springfield-SU	\$ 64.73	10.47%	\$	3.48	18.61	6.32	0.34
Missoula-MUT	\$ 50.19	18.51%	\$	2.73	18.36	10.22	0.56
Broome County	\$ 53.95	31.75%	\$	2.18	24.77	17.50	0.71
Utica-UTA	\$ 43.34	9.88%		2.90	14.93	10.14	0.68
Salem-SAMTD	\$ 84.83	10.73%	\$	2.86	29.63	23.00	0.78
Erie-EMTA	\$ 58.32	57.57%	\$	2.60	22.41	13.43	0.60
Bellingham-WTA	\$ 89.20	21.77%	\$	2.54	35.12	35.96	1.02
GROUP MEAN AVERAGE:	\$58.09	18.30%		\$3.22	19.45	11.35	0.56

### SMALL BUS SUMMARY

Performance Measure	Data	Mean	<b>Standard Deviation</b>
Cost/Hour	2002	\$46.68	\$10.88
Operating Ratio	2002	10.85%	3.89%
Cost/Passenger	2002	\$10.62	\$5.11
Passenger/Hour	2002	6.25	3.05
Passenger/Capita	2002	4.65	2.10
Hours/Capita	2002	0.80	0.41

Performance Parameters +/- One Standard Deviation

\$35.80	\$57.55
6.96%	14.73%
\$5.51	\$15.73
3.20	9.30
2.55	6.76
0.39	1.21

						Revenue
	Expense/	Operating	Cost/	Passengers/	Passengers/	Hours/
Small Bus	Revenue Hour	Ratio	Passenger	Revenue Hour	Capita	Capita
Bay Area Rural	\$46.27	9.57%	\$10.45	3.54	1.16	0.33
Fond du Lac	\$38.08	11.76%	\$8.51	5.75	5.58	0.97
Ladysmith	\$35.49	11.89%	\$8.41	4.53	7.63	1.68
Manitowoc	\$61.25	8.57%	\$11.67	10.96	5.93	0.54
Merrill	\$64.81	18.33%	\$5.45	11.07	6.40	0.58
Monona	\$41.23	10.86%	\$9.21	4.48	3.13	0.70
Rice Lake	\$39.10	4.45%	\$22.47	3.81	3.37	0.88
Stevens Point	\$47.17	11.33%	\$8.83	5.87	4.03	0.69
GROUP MEAN AVERAGE:	\$ 46.68	10.85%	\$10.62	6.25	4.65	0.80

### PERFORMANCE STANDARDS SHARED RIDE TAXI SUMMARY

Performance Measure	Data	Mean	<b>Standard Deviation</b>
Cost/Hour	2002	\$21.27	\$4.40
Operating Ratio	2002	27.22%	7.47%
Cost/Passenger	2002	\$7.81	\$2.49
Passenger/Hour	2002	2.92	0.84
Passenger/Capita	2002	3.96	2.70
Hours/Capita	2002	1.34	0.95

Performance Parameters +/- One Standard Deviation

\$16.88	\$25.67
19.75%	34.69%
\$5.32	\$10.30
2.08	3.76
1.26	6.66
0.39	2.29

Shared-Ride Taxi	Expense/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Baraboo	\$27.32	35.97%	\$8.76	3.12	3.74	1.20
Beaver Dam	\$17.55	31.27%	\$5.67	3.10	7.47	2.41
Berlin	\$25.10	22.10%	\$6.76	3.71	5.46	1.47
Black River Falls	\$30.50	26.22%	\$8.18	3.73	8.72	2.34
Chippewa Falls	\$19.48	29.69%	\$5.44	3.58	4.86	1.36
Clintonville	\$23.51	19.27%	\$10.57	2.22	2.07	0.93
Edgerton	\$17.74	21.71%	\$9.21	1.93	1.08	0.56
Fort Atkinson	\$19.91	30.88%	\$5.75	3.46	4.20	1.21
Grant Co.	\$19.84	19.15%	\$5.87	3.38	0.74	0.22
Hartford	\$27.51	26.92%	\$7.44	3.70	1.62	0.44
Jefferson	\$19.50	27.38%	\$6.33	3.08	2.83	0.92
Lake Mills	\$19.02	16.77%	\$10.77	1.77	1.40	0.80
Marinette	\$26.03	23.84%	\$7.26	3.59	3.04	0.85
Marshfield	\$18.76	35.15%	\$5.13	3.66	4.61	1.26
Mauston	\$24.17	40.27%	\$6.99	3.46	6.83	1.98
Medford	\$15.58	20.22%	\$8.28	1.88	2.70	1.43
Monroe	\$20.52	33.77%	\$4.96	4.14	4.80	1.16
Neillsville	\$18.43	21.44%	\$8.73	2.11	4.62	2.19
New Richmond	\$23.96	18.03%	\$13.52	1.77	1.46	0.83
Onalaska	\$22.97	18.91%	\$10.27	2.24	1.44	0.64
Ozaukee Co.	\$32.04	14.80%	\$15.13	2.12	0.76	0.36
Platteville	\$14.80	25.70%	\$7.09	2.09	2.00	0.96
Plover	\$17.81	29.75%	\$10.89	1.64	1.12	0.68
Port Washington	\$24.43	25.60%	\$6.80	3.59	2.12	0.59
Portage	\$25.65	41.42%	\$7.10	3.61	11.68	3.23
Prairie Du Chien	\$23.03	26.70%	\$7.10	2.85	4.20	1.47
Prairie Du Sac	\$15.80	19.47%	\$8.95	1.77	9.42	5.33
Reedsburg	\$22.65	30.41%	\$5.94	3.81	5.15	1.35
Rhinelander	\$22.03 \$19.52	39.11%	\$6.73	2.90	8.55	2.95
Ripon	\$23.30	24.25%	\$7.43	3.14	4.64	1.48
River Falls	\$23.30	18.44%	\$9.89	2.76	1.69	0.61
Shawano	\$13.63	45.36%	\$9.69 \$4.51	3.02	4.32	1.43
Stoughton	\$24.55	29.28%	\$5.74	4.28	3.00	0.70
Sun Prairie	\$23.61	31.51%	\$6.20	3.81	2.93	0.70
	\$23.61	29.30%	\$4.95	3.48	8.02	2.30
Viroqua Washington County	\$17.25 \$11.14	29.30%	\$4.95 \$8.95	3.48 1.24	8.02 0.47	0.38
Watertown	\$19.43	33.36%	\$4.71	4.12	5.98 5.91	1.45
Waupaca	\$21.56	32.56%	\$6.76	3.19		1.85
Waupun	\$18.25	11.70%	\$13.96	1.31	0.59	0.45
West Bend	\$20.99	28.52%	\$6.19	3.39	4.59	1.35
Whitewater	\$19.78	27.82%	\$7.19	2.75	1.51	0.55
Wis Rapids	\$21.06	32.28%	\$9.45	2.23	4.02	1.80
GROUP MEAN AVERAGE:	\$21.27	27.22%	\$7.81	2.92	3.96	1.34

### MILWAUKEE CO EXTERNAL PEER GROUP SUMMARY

Performance Measure	Data	Mean	<b>Standard Deviation</b>
Cost/Hour	2002	\$89.76	\$15.17
Operating Ratio	2002	24.93%	6.91%
Cost/Passenger	2002	\$3.14	\$0.59
Passenger/Hour	2002	29.08	5.31
Passenger/Capita	2002	21.42	11.96
Hours/Capita	2002	0.72	0.33

Performance Parameters +/- One Standard Deviation

\$74.59	\$104.93
18.01%	31.84%
\$2.55	\$3.74
23.77	34.40
9.45	33.38
0.39	1.05

						Revenue
	Expense/	Operating	Cost/	Passengers/	Passengers/	Hours/
MCTS Peer Group	Revenue Hour	Ratio	Passenger	Revenue Hour	Capita	Capita
Milwaukee-County	\$78.82	32.00%	\$1.82	43.30	48.09	1.11
Oakland-ACCTD	\$108.18	19.26%	\$3.16	34.22	21.33	0.62
Denver-RTD	\$82.29	31.27%	\$3.03	27.12	35.11	1.29
Indianapolis-IPT	\$64.07	23.89%	\$2.78	23.02	8.15	0.35
Louisville-TARC	\$68.70	15.34%	\$2.75	25.01	16.96	0.68
Detroit-D-DOT	\$106.31	13.86%	\$4.17	25.49	10.19	0.40
Minneapolis-St. Paul-MT	\$92.82	33.11%	\$2.75	33.70	29.13	0.86
Kansas City-KCATA	\$89.53	16.84%	\$3.29	27.24	10.51	0.39
St. Louis-Bi-State	\$95.84	32.34%	\$3.30	29.07	15.54	0.53
Cincinnati-SORTA	\$73.73	33.53%	\$2.64	27.95	16.20	0.58
Cleveland-RTA	\$99.77	24.25%	\$3.48	28.66	25.28	0.88
Columbus-COTA	\$89.24	23.77%	\$3.88	22.98	14.29	0.62
Pittsburgh-PAA	\$91.27	27.94%	\$3.23	28.25	37.09	1.31
Providence-RIPTA	\$116.07	21.57%	\$3.73	31.16	12.00	0.39
GROUP MEAN AVERAGE:	\$89.76	24.93%	\$3.14	29.08	21.42	0.72

### MADISON METRO EXTERNAL PEER GROUP SUMMARY

Performance Measure	Data	Mean	<b>Standard Deviation</b>
Cost/Hour	2002	\$75.45	\$14.74
Operating Ratio	2002	29.44%	8.61%
Cost/Passenger	2002	\$2.96	\$0.71
Passenger/Hour	2002	26.59	6.71
Passenger/Capita	2002	16.38	8.47
Hours/Capita	2002	0.60	n 27

# Performance Parameters +/- One Standard Deviation

\$60.70	\$90.19
20.84%	38.05%
\$2.26	\$3.67
19.89	33.30
7.91	24.85
0.33	0.87

						Revenue
	Expense/	Operating	Cost/	Passengers/	Passengers/	Hours/
Madison Metro Peer Group	Revenue Hour	Ratio	Passenger	Revenue Hour	Capita	Capita
Madison-MMT	\$80.94	21.75%	\$2.70	30.01	33.06	1.10
Hartford-CT Transit	\$76.98	28.69%	\$2.15	35.75	20.16	0.56
Des Moines-Metro	\$64.04	42.26%	\$2.47	25.90	10.43	0.40
Indianapolis-IPT	\$64.07	23.89%	\$2.78	23.02	8.15	0.35
Lansing-CATA	\$84.91	17.24%	\$2.23	38.12	27.54	0.72
Omaha-OTA	\$53.97	26.80%	\$4.36	12.38	5.74	0.46
Albany-CDTA	\$66.21	40.68%	\$2.77	23.88	22.80	0.95
Rochester-RGRTA	\$78.99	38.34%	\$2.99	26.44	18.03	0.68
Syracuse-CNY Centro	\$80.57	31.79%	\$2.44	32.97	22.59	0.69
Dayton-MVRTA	\$78.06	23.47%	\$3.24	24.06	14.60	0.61
Harrisburg-CAT	\$69.28	44.26%	\$3.38	20.51	6.66	0.32
Providence-RIPTA	\$116.07	21.57%	\$3.73	31.16	12.00	0.39
Richmond-GRT	\$57.89	33.29%	\$1.84	31.44	16.69	0.53
Spokane-STA	\$75.73	26.97%	\$3.60	21.04	22.46	1.07
Tacoma-Pierce Transit	\$83.97	20.66%	\$3.78	22.19	4.79	0.22
GROUP MEAN AVERAGE:	\$75.45	29.44%	\$2.96	26.59	16.38	0.60

### COMMUTER BUS EXTERNAL PEER GROUP SUMMARY

Performance Measure	Data	Mean	Standard Deviation
Cost/Hour	2002	\$86.66	\$27.23
Operating Ratio	2002	18.43%	2.17%
Cost/Passenger	2002	\$10.10	\$4.34
Passenger/Hour	2002	9.26	3.68
Passenger/Capita	2002	0.98	0.62
Hours/Capita	2002	0.10	0.04

Performance Parameters +/- One Standard Deviation

\$59.43	\$113.89
16.26%	20.60%
\$5.76	\$14.43
5.58	12.93
0.37	1.60
0.06	0.14

Commuter Bus	Expense/ Revenue Hour	Operating Ratio	Cost/ Passenger	Passengers/ Revenue Hour	Passengers/ Capita	Revenue Hours/ Capita
Ozaukee Co.	\$101.47	20.87%	\$7.42	13.68	1.35	0.10
Racine Com.	\$112.95	18.09%	\$16.52	6.84	0.45	0.07
Washington Co.	\$50.80	15.66%	\$8.92	5.69	0.47	0.08
Waukesha Co.	\$81.41	19.10%	\$7.52	10.83	1.66	0.15
GROUP MEAN AVERAGE:	\$86.66	18.43%	\$10.10	9.26	0.98	0.10

## SUMMARY RESULTS STEP ONE ANALYSIS

The following eight transit systems failed to meet the performance standards in two or more performance measures. The compliance, at this stage, is defined as meeting the standard for three of the six cost efficiency measures.

	Efficiency		Effectiveness			
Expense/Revenue	Operating	Cost/Passenger	Passengers/Revenue	Passengers/Capita	Revenue	
Hour	Ratio		Hour		Hours/Capita	
		Share	ed Ride Taxis			
	Grant Co.			Grant Co.	Grant Co.	
	Lake Mills	Lake Mills	Lake Mills			
	New	New	New Richmond			
	Richmond	Richmond				
Ozaukee Co.	Ozaukee	Ozaukee Co.		Ozaukee Co.	Ozaukee Co.	
	Co.					
		Plover	Plover	Plover		
			Washington Co.	Washington Co.	Washington	
					Co.	
	Waupun	Waupun	Waupun	Waupun		

# **Summary Results for Step Two Analysis**

Performance Over Past 5 Years (1998-2002)/Five Year Trend Analysis

	Expense/Revenue	Operating	Cost/Passenger	Passengers/Revenue	Passengers/Capita	Revenue	Number of	Number of	Final	System
	Hour	Ratio	0 0 0 0 0 1 0 0 0 1 1 0 0 0 1 1 0 0 0 1	Hour	1 uss til gols, cuplin	Hours/Capita	areas out	areas out of	number of	pass/fail
						1	of	compliance	areas out	1
							compliance	that show	of	
							_	improvement	compliance	
Grant Co.	In Compliance	Improvement	In Compliance	In Compliance	No Improvement	Improvement	3	2	1	Pass
Lake Mills	In Compliance	No	No	No Improvement	In Compliance	In	3	0	3	Fail
		Improvement	Improvement			Compliance				
New	In Compliance	No	No	Improvement	In Compliance	In	3	1	2	Pass
Richmond		Improvement	Improvement			Compliance				
Ozaukee	Improvement	Improvement	Improvement	In Compliance	Improvement	Improvement	5	5	0	Pass
Co.										
Plover	In Compliance	In	Improvement	Improvement	Improvement	In	3	3	0	Pass
		Compliance				Compliance				
Washington	In Compliance	In	In Compliance	Improvement	Improvement	Improvement	3	3	0	Pass
Co.		Compliance								
Waupun	In Compliance	No	No	Improvement	No Improvement	In	4	1	3	On-
		Improvement	Improvement			Compliance				hold*

Shading indicates areas where system was out of compliance after Step 1 analysis.

\*Waupun shared-ride taxi service suspended operation after 1998 and it was not reestablished until 2002. Waupun also had two different service contractors in 1998 and 2002. Given the three-year suspension of service and the operational differences, the step 2 trend analysis will be postponed until more data in established.